

March 9, 2006



Marlene H. Dortch
Secretary
Federal Communications Commission
TW-A325
445 Twelfth St., SW
Washington, DC 20554

Re: *Notice of Ex parte* presentation in WB Docket No. 05-211

Dear Ms. Dortch:

On March 8, 2006, Harold Feld of Media Access Project spoke with Leslie Marx, Chief Economist, with regard to the above captioned proceeding.

Specifically, Mr. Feld called to express support on behalf of NHMC, *et al.* for the proposal discussed in the trade press to adopt a rule that conceals the identity of bidders during the auction. Several published papers studying collusion in general and FCC auctions specifically have found evidence of tacit "collusion by signaling" and recommended concealing the identity of bidders to discourage such forms of tacit collusion. *See, e.g.*, Sandra Brusco & Guiseppe Lopomo, "Collusion via Signaling In Simultaneous Ascending Bid Auctions With Heterogenous Objects With and Without Complementarities (working paper) (2004); Paul Klemperer, Using and Abusing Economic Theory (2003); Paul Klemperer, How (Not) To Run Auctions: The European 3G Experience (2002).

Mr. Feld stressed, however, that the FCC should make public round by round auction data with bidders identified *after* the completion of the auction. While anonymous bid auctions can help prevent tacit collusion with minimal sacrifice of efficiency, post-auction disclosure is important in helping to identify explicit collusion of patterns of conduct that interfere with the goals of the auction system as set forth in Section 309(j). Indeed, as NHMC proposed in its comments, the Commission should work to significantly increase the utility of its post-auction disclosure of information.

In accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206, this letter is being filed with your office. If you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

Harold Feld

Senior Vice President

cc:
Leslie Marx